

UNITED STATES OF AMERICA	*	Criminal 99-226(HL)
Plaintiff	*	
V.	*	
REYES H. ORTIZ-FUENTES	*	
Defendant	*	

REQUEST FOR EARLY TERMINATION OF SUPERVISED RELEASE TERM

TO THE HONORABLE COURT:

COMES NOW defendant Reyes H. Ortiz-Fuentes represented by the undersigned attorney and respectfully states and prays:

1. On September 19, 2000 the Court imposed judgment in the case of caption and it was adjudged that defendant would be placed on supervised release for a term of four (4) years, upon release from imprisonment. The standard conditions of Supervision were imposed as well as additional Supervised Release Terms.
2. At the time of sentencing an adjustment was made in the role in the offense as the parties had stipulated a minor role adjustment. (Sent. Guideline §3B1.2(b)). There were no victim related adjustments nor any findings of obstruction of justice. (Pre Sentence Report page 4). Further, after the required investigation, the probation officer did not identify any adverse information that would warrant a departure from the sentencing guidelines. (Pre-Sentence Report page 11)
3. At sentencing a criminal monetary penalty of \$5,000.00 was imposed. Defendant has fully satisfied said debt.

4. Defendant was released from imprisonment and commenced serving the term of supervised release imposed.
5. It is submitted that defendant has fully complied with all the conditions of supervised release, including the standard and special conditions imposed. Defendant has provided full disclosure of all financial information requested and has duly filed with the Commonwealth of Puerto Rico Department of Treasury the income tax returns required by law.
6. Defendant hereby requests that the partial term served of supervised release is sufficient to satisfy the requirements of law; that he is rehabilitated and has so demonstrated.
7. Defendant based on the above is requesting the Court for early termination of his supervised release.
8. Witnesses are available to testify on behalf of this defendant as to his conduct, compliance with the law as well as compliance with the terms of supervised release. Even though a hearing on this issue is discretionary from the Court the evidence available to sustain the request herein made will support every allegation in this motion and should be heard by the Court.

WHEREFORE, it is respectfully requested that the Court grant the instant motion and enter an order terminating the supervised release term and in the alternative that a hearing be held to allow the presentation of witnesses on behalf and in support of defendant's request.

CERTIFICATE OF SERVICE: I hereby certify that on this date the present document has been filed electronically and is available for viewing and downloading from the Court's CM/ECF system by the U.S. Attorney's Office

and by facsimile to U.S. Probation Office.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 22nd day of November, 2004.

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